

# **Exhibit D**

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September 25, 2024

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**VIA E-MAIL**

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**Re: Plaintiffs' Second Request to the Underwriters for the Production of Documents in *In re DiDi Global Inc. Securities Litigation, No. 1:21-cv-05807-LAK (S.D.N.Y.)***

Dear Larry:

Below are our responses to your September 13 letter about the Underwriter Defendants' July 5 Responses and Objections to Plaintiffs' Second Request for the Production of Documents from the Underwriter Defendants (the "Responses").

**RFP No. 41.** As stated in our September 11, 2024 letter, and as we have maintained throughout, our investigation to date indicates that stabilizing transactions occurred in the period between July 2 and July 7, 2021. You provide no justification for an extended search period as we requested in our September 11 letter, but merely state that the Underwriter Defendants must produce "evidence of all stabilizing transactions" from June 28 through July 23, 2021. We are not aware of any stabilizing transactions after July 7. As you know, we are in the process of producing documents in response to Plaintiffs' document requests. If, upon your review of those documents, you can point to grounds for expanding the search, we are willing to discuss. And if, in the course of our production, we learn of stabilizing transactions after July 7, we will inform you.

**RFP No. 42.** Thank you for agreeing to table this Request until you review our production.

**RFP No. 43.** Beyond citing a Wall Street Journal article referencing investors' "anger and suspicion," you have provided no basis for your belief that any of the Underwriter Defendants had unofficial communications with investors. And we have already agreed to search for, and produce, any non-privileged (and non-PRC law protected) approved official communications to investors by the three Lead Underwriters. Further, we will be producing ESI from 17 custodians through July 23, 2021, and you are to depose one such custodian as Morgan Stanley's 30(b)(6) witness on October 22. We are willing to revisit the issue after the deposition and upon your review of the Underwriter Defendants'

productions, provided you have some articulable basis for your speculation about unofficial communications.

Sincerely,

*/s/ Jonathan Rosenberg*

Jonathan Rosenberg